

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OUSSAMA EL OMARI, an individual
and United States Citizen residing in the
State of North Carolina,

Plaintiff,

-against-

RAS AL KHAIMAH FREE TRADE ZONE
AUTHORITY, a/k/a R.A.K. FREE TRADE
ZONE AUTHORITY, a/k/a RAKFTZA,
a corporation organized under the laws of Ras
Al Khaimah, United Arab Emirates,

KREAB (USA) INC., a corporation
organized under the laws of the State
of New York,

SHEIKH SAUD BIN SAQR AL QASIMI,
an individual and United Arab Emirates
Citizen, residing in the United Arab
Emirates, and Emir of Ras Al Khaimah,
United Arab Emirates, sued in his individual,
and official capacity, and

THE ARKIN GROUP LLC, a limited
liability company organized under the
laws of the State of New York,

Defendants.

Case No.: 1:16-cv-3895 (NRB) (SN)

ORAL ARGUMENT REQUESTED

**NOTICE OF DEFENDANT KREAB (USA)
INC.'S MOTION TO DISMISS THE
SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Kreab (USA) Inc.'s Motion to Dismiss the Second Amended Complaint, and all the pleadings and proceedings herein, Defendant Kreab (USA) Inc., through its undersigned counsel, will move this Court before the Honorable Naomi R. Buchwald, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse

located at 500 Pearl St., Courtroom 21A, New York, New York 10007-1312, at a date and time as the Court may direct, for an order, pursuant to Fed. R. Civ. P. 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Second Amended Complaint in the above-referenced action for failure to state a claim, with prejudice and without leave to amend, and for other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation ordered by the Court on October 24, 2016, Plaintiff Oussama El Omari's opposing papers, if any, shall be served on or before December 2, 2016, and Defendant Kreab (USA) Inc.'s reply papers, if any, shall be served on or before December 20, 2016.

Dated: October 28, 2016
New York, New York

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